

September 10, 2015

Mr. Donald Herr
Hanover Foods Corp
1486 York Street PO Box 334
Hanover, PA 17331-0334

Re: Comment Response -3F
Hanover Foods
NPDES Permit No. PA0044741
Authorization ID No. 946303
Penn Township, York County

Dear Mr. Herr:

We received your comment dated August 7, 2015, and provide the following response according to the order it was received.

1. This is a general notification to facilities. No action is required, if this facility believes there are no outstanding violations.
2. Reporting forms are typically added to the final permit but are enclosed per your request.
3. The existing COA will be amended for consistency with schedules in the permit.
4. This comment will be addressed.
5. TRC, Fecal Coliform and pH collected as grab samples and are reported on DMR as instantaneous maximum limits.
6. Keeping TRC In the permit is justified because Hanover has existing TRC limit, and proposed to continue using sodium Hypochlorite as a chemical additive.
7. Mass limitations and concentration limitations are required for water quality based effluent limits. Refer to DEP guidance document 362-0400-001, Table 5-2 for further information. The parameters referenced have water quality based limits.
8. Fecal coliform limitation is a technology based limit which has to be met from permit effective date. Compliance schedule is not permissible to comply with technology based limits. Refer to 40 CFR § 122.47 for more information.
9. The monitoring requirement for color is to collect enough data for analysis at the next permit renewal. If the data show color is not a concern, it may be discontinued. DEP has authority under PA code 25 § 9a. 61.(b) to require reasonable monitoring of parameters that may affect effluent quality.
10. Storm water will be replaced by cooling water.
11. Storm water will be replaced by cooling water.
12. Read maximum temperature for the day from the chart.
13. The compliance schedule requirements in the permit are different from those in the COA.

14. At this time, no trading will be allowed outside of an impaired watershed.
15. No offsets have been approved for this facility.
16. Yes all permits with Chesapeake Bay load are required to use eDMR for reporting DMRs and supplementary forms.
17. TRC testing is required since the use of sodium hypochlorite as a chemical additive was approved based on the premise that, TRC will be monitored according to permit Requirements.
18. Acknowledged
19. No specific monitoring for this requirement is warranted at this time.
20. This is a general definition in all permits which does not apply to this facility.
21. Hanover Foods will have an opportunity to comment on the draft permit should the permit be re-opened to include a more stringent phosphorus requirement.
22. The schedule will remain the same in the permit. Follow the permit condition to address any anticipated and or non-compliance.
23. This will be addressed in the final permit.
24. Acknowledged
25. The definitions in the permit are standard. The final permit will be revised to reflect the operations at Hanover Foods.

Your comments on the fact sheet are well noted and will be added to our records. We hope your comments on the draft permit have been addressed

If you have further questions, please call me at 717.705.4815.

Sincerely,

J. Pascal Kwedza
Environmental Engineering Specialist
Clean Water Program

cc: Mark Pickering, P.E., GHD